

**Climate Pollution Reduction Grants Program:  
Implementation Grants Competition for Tribes and Territories  
Notice of Funding Opportunity (NOFO)  
EPA-R-OAR-CPRGT-23-09  
Questions and Answers as of **October 20, 2023****

The U.S. Environmental Protection Agency (EPA) is accepting applications for funding under the Climate Pollution Reduction Grants Program: Implementation Grants Competition for Tribes and Territories (EPA-R-OAR-CPRGT-23-09) until **May 1, 2024 at 11:59 p.m. (ET)**.

The NOFO and all application forms are available at <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>. EPA hosted informational webinars on September 27, 2023, and October 5, 2023. Recordings and material from those webinars can be found [here](#).

This document contains responses to questions raised in EPA's informational webinars and to questions submitted to the CPRG email inbox. EPA plans to update this document regularly with additional incoming questions regarding the CPRG Implementation Grants Competition for Tribes and Territories. (Note that responses to questions about the CPRG Implementation Grants General Competition (EPA-R-OAR-CPRGI-23-07) are located in a separate document available [here](#)).

Please review all questions and answers in this document. Questions marked **NEW** or **UPDATED** have been added or revised since the last posting of this document. If you have any additional questions, please email [CPRG@epa.gov](mailto:CPRG@epa.gov) by **April 15, 2024** in order for EPA to provide a response prior to the competition application closing date of May 1, 2024.

## Table of Contents

<b>I. Application Process and Timeline .....</b>	<b>5</b>
Q1: What is the application deadline for the CPRG implementation grants Tribes and territories competition? ....	5
Q2: What is the difference between the two notices of funding opportunity for CPRG implementation grants: the general competition and the competition for Tribes and territories? .....	5
Q3: Can eligible applicants from Tribes and territories apply for grants under both the general competition NOFO and the Tribes and territories NOFO?.....	5
Q4: How do the implementation grants relate to the CPRG planning grants? .....	5
Q5: Do I have to submit a Notice of Intent (NOI) to Apply? What information is required for submitting a Notice of Intent to Apply? Will EPA provide any feedback in response to a NOI? .....	5
Q6: Will a list of organizations that have submitted NOIs be released? .....	6
Q7: How many applications can I submit? .....	6
Q8: What is the timeframe for the grants? How much time will a grantee have to complete the projects? .....	6
Q9: When are PCAPs due? Does EPA have to approve the PCAPs? .....	6
Q10: Is it possible to submit my PCAP earlier than the due date to get further guidance on our implementation grants to increase chances of an implementation award? .....	6
Q11: Where and when will I be able to find the PCAPs? Are there any requirements or expectations that PCAP lead organizations make publicly available their draft plans or some level of information prior to the PCAP deadline? .....	6
Q12: Can an applicant apply for an implementation project before a PCAP is complete? .....	7
Q13: Will this grant require matching funds? .....	7
Q14: Will EPA offer additional rounds of funding, including for measures in the Comprehensive Climate Action Plans? Or is this the only opportunity for CPRG implementation grants?.....	7
Q15: What tools, resources, and technical assistance will EPA provide for applicants? Will EPA host webinars or trainings on the NOFOs? .....	7
Q16: How will EPA responses to questions be documented?.....	8
<b>II. Eligible Applicants .....</b>	<b>8</b>
Q1: Who is eligible to apply for an implementation grant under the Tribes and territories competition? If I didn't receive a planning grant, am I still eligible to apply? Do I have to develop my own PCAP to apply? .....	8
Q2: What does it mean to be covered by a PCAP? Can I be covered by multiple PCAPs? .....	8
Q3: Are multiple agencies or offices within a Tribal or territorial government able to apply? .....	8
Q4: Are there any restrictions on the size and type of coalition I can organize for an implementation grant application?.....	9
Q5: Can I use a climate action plan that is not funded through a CPRG planning grant as the basis for my implementation grant application?.....	9
Q6: What entities are eligible to apply from Florida, Iowa, Kentucky, and South Dakota? .....	10

Q7: Under a coalition, would coalition members be subgrantees of the coalition lead? .....	10
Q8: Can I still apply for a planning grant to develop a PCAP? .....	10
Q9: Would EPA accept a less formal type of agreement for a coalition than a Memorandum of Agreement (MOA)? What if I am unable to get an MOA signed by all coalition members by the deadline for the application? .....	10
Q10: Does the MOA or other written instrument or documented arrangement need to be complete by the time I submit a Notice of Intent to Apply (NOI)? .....	10
Q11: Can I add someone to the coalition after I apply? .....	10
<b>III. Eligible Measures.....</b>	<b>11</b>
Q1: What types of projects are eligible for funding?.....	11
Q2: Are carbon sink projects, or projects that enhance carbon removal, eligible? .....	11
Q3: Are climate adaptation or resilience measures eligible? .....	11
Q4: Can an implementation grant application request funds to hire staff to implement GHG reduction measures included in the application? .....	11
Q5: Can an implementation grant application request funds for job training? .....	11
Q6: How broadly or narrowly do GHG reduction measures need to be defined in the application?.....	11
Q7: Can I apply for funding to implement multiple GHG reduction measures in one application?.....	12
Q8: Are implementation grants meant to implement a PCAP measure in its entirety, or can it focus on a subset of the components and actions in one measure?.....	12
<b>IV. Contracts, Subawards, and Participant Support Costs .....</b>	<b>12</b>
Q1: Can an applicant applying as an individual applicant make subawards to other eligible applicants, non-eligible entities, and contractors? If so, what requirements apply to subawards? .....	12
Q2: Could a non-profit group be paid with CPRG planning grant money to write an implementation grant for a Tribe, Tribal consortium, or territory? .....	13
<b>V. Competition Structure .....</b>	<b>13</b>
Q1: What size grants can I apply for? .....	13
Q2: How many applications can an eligible applicant submit? Is there an application limit per tier? .....	13
Q3: Can two entities submit separate applications to fund the same measure? .....	13
Q4: The NOFO states that EPA will not award multiple grants to implement the same measure in the same location. Can you clarify what you mean by "same location"? .....	13
<b>VI. Evaluation and Awards .....</b>	<b>14</b>
Q1: What are the differences between the Tribes and territories NOFO and the general competition NOFO? If Tribes and territories are considering whether to apply to both NOFOs, what do they need to know? .....	14
Q2: What is EPA's process for scoring the applications and awarding the grants? .....	14
Q3: Will Tribes need to discuss and calculate benefits to low-income and disadvantaged communities if applying under the Tribes and territories competition?.....	14

Climate Pollution Reduction Grant Program  
Implementation Grants Competition for Tribes and Territories -- Questions and Answers Document  
October 20, 2023

<i>Q4: If we do not have a history of managing EPA grants, will that negatively affect the points we get for criteria 5.a (past performance) and 5.b (reporting requirements)? Will this effectively disqualify our application or limit our chances to secure CPRG grant funding? .....</i>	<i>15</i>
<i>Q5: EPA provides templates for several of the required deliverables (e.g., Cover Page, Budget Table, etc.). Am I required to use these resources in my application? .....</i>	<i>15</i>
<i>Q6: Where should I send a question about the Evaluation Criteria or other application requirements?.....</i>	<i>15</i>
<i>Q7: EPA provides a list of GHG reduction measures in the Tribes and territories competition NOFO. Are these the only measures that EPA will fund under this program? .....</i>	<i>15</i>
<i>Q8: What types of applicant diversity will be considered in the selection process?.....</i>	<i>15</i>
<i>Q10: Do I need to quantify GHG emissions impacts in the application? .....</i>	<i>16</i>
<i>Q11: How will EPA evaluate the magnitude of GHG emission reductions? Will it consider the relative reductions achieved for the entities? .....</i>	<i>16</i>

## I. Application Process and Timeline

*Q1: What is the application deadline for the CPRG implementation grants Tribes and territories competition?*

A1: Applications for the implementation grants competition for Tribes and territories (EPA-R-OAR-CPRGT-23-09) are due on May 1, 2024.

*Q2: What is the difference between the two notices of funding opportunity for CPRG implementation grants: the general competition and the competition for Tribes and territories?*

A2: Generally speaking, eligible applicants for the general competition (EPA-R-OAR-CPRGI-23-07) are states, municipalities, Tribes, Tribal consortia, territories, and groups thereof, whereas eligible applicants for the Tribal and territories competition (EPA-R-OAR-CPRGT-23-09) are limited to Tribes, Tribal consortia, territories and groups thereof. Other important differences between these two competitions, such as funding amounts, evaluation criteria, and application deadlines, are described in detail in the Notices of Funding Opportunity (NOFOs) for these two competitions, both available at: <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>.

*Q3: Can eligible applicants from Tribes and territories apply for grants under both the general competition NOFO and the Tribes and territories NOFO?*

A3: Yes. A Tribe or territory may submit applications in both the general competition and the Tribes and territories competition. Furthermore, a Tribe or territory may submit applications to implement the same measure under both competitions. Applicants must apply separately to each competition, and they must submit applications that meet the specific requirements of each competition, which are not the same. One application will not automatically serve for both programs.

In the event that both applications score well enough to be selected under the two separate competitions, EPA would only make one grant award to the applicant.

*Q4: How do the implementation grants relate to the CPRG planning grants?*

A4: As explained in Section I.A of the Tribes and Territories Competition NOFO (page 5), the 2022 Inflation Reduction Act (IRA) established the CPRG program, which provides funds in two distinct but related phases:

1. Planning grants: \$250 million for states, U.S. territories, municipalities, air pollution control agencies, Tribes, and groups thereof to develop plans to reduce greenhouse gases (GHGs). The Priority Climate Action Plan (PCAP) is the first deliverable due under the CPRG planning grants.
2. Implementation grants: \$4.6 billion for competitive grants to eligible applicants to implement GHG reduction programs, policies, projects, and measures (collectively referred to as "GHG reduction measures," or "measures") identified in a PCAP developed under a CPRG planning grant.

*Q5: Do I have to submit a Notice of Intent (NOI) to Apply? What information is required for submitting a Notice of Intent to Apply? Will EPA provide any feedback in response to a NOI?*

A5: To allow for efficient management of the competitive process, EPA requests submittal of an informal *Notice of Intent (NOI) to Apply* by March 1, 2024, to [CPRG@epa.gov](mailto:CPRG@epa.gov). As described on page 1 of the

NOFO, please include in the body of the email the dollar amount of the anticipated funding request and one to two sentences about the scope and sector(s) of the greenhouse gas (GHG) reduction measures likely to be included in the potential implementation grant application. Additionally, if intending to apply as the lead applicant representing a coalition, please list all anticipated coalition members.

Submission of an NOI is optional and non-binding; it is a process management tool that will allow EPA to better anticipate the resources required for efficient evaluation of submitted applications. EPA will not be able to provide feedback in response to an NOI.

*Q6: Will a list of organizations that have submitted NOIs be released?*

A6: EPA does not anticipate publishing a list of organizations that submit NOIs.

*Q7: How many applications can I submit?*

A7: As described on page 19 of the NOFO, each eligible applicant is limited to submitting two grant applications for this NOFO: one as an individual applicant and one as the lead applicant for a coalition. Applicants may participate in more than one coalition but may only serve as lead applicant for one coalition.

Note, Tribes and territories may submit applications to both this competition and the CPRG Implementation Grants General Competition.

*Q8: What is the timeframe for the grants? How much time will a grantee have to complete the projects?*

A8: The estimated period of performance for awards resulting from this solicitation will be up to five years. The estimated project start date for awards is December 1, 2024. See Section II.F of the NOFO.

*Q9: When are PCAPs due? Does EPA have to approve the PCAPs?*

A9: As explained in Section I.A of the NOFO, PCAPs are due April 1, 2024, for Tribes, Tribal consortia, or territories that plan to apply to the CPRG implementation grants competition for Tribes and territories. Otherwise, PCAPs are due March 1, 2024, for states, Metropolitan Statistical Areas (MSAs) and Tribes, Tribal consortia, and territories that plan to apply to the CPRG implementation grants general competition.

EPA project officers will review submitted deliverables, including PCAPs, to ensure they meet the requirements of the [CPRG Planning Grant Program Guidance](#) and the terms and conditions of the planning grants. EPA will not approve or provide feedback on the list of GHG measures included in a PCAP or analyses related to those measures.

*Q10: Is it possible to submit my PCAP earlier than the due date to get further guidance on our implementation grants to increase chances of an implementation award?*

A10: Due to the competitive nature of the implementation grant phase of the CPRG program, EPA will not be able to provide feedback on PCAPs.

*Q11: Where and when will I be able to find the PCAPs? Are there any requirements or expectations that PCAP lead organizations make publicly available their draft plans or some level of information prior to the PCAP deadline?*

A11: The CPRG planning grant program guidance specified that when developing a PCAP, lead organizations must coordinate and collaborate with other eligible entities within their jurisdictions and

ensure that priority measures are included in the plan that can be implemented by those entities (page [19](#) of CPRG Planning Grant Program Guidance for States, Municipalities, and Air Pollution Control Agencies; page [13](#) of CPRG Planning Grant Program Guidance for Federally Recognized Tribes, Tribal Consortia, and U.S. Territories). In all cases, the lead organizations for CPRG planning grants are required to make their PCAPs available to other entities for their use in developing implementation grant applications, and EPA will publicly post all PCAPs received on the [CPRG website](#).

EPA strongly encourages lead organizations to make draft versions of their PCAPs available as early as possible so that entities considering whether to submit an implementation grant application can begin development of their applications well before the May 1, 2024 deadline for the Tribes and territories competition. Please see page 7 of the NOFO for more information.

EPA also encourages eligible applicants that are considering applying for a CPRG implementation grant to participate in the PCAP development process and provide input on priority measures to include in the plan, in collaboration with other participants and stakeholders. Section 8.4.3 of the Planning Grants Program Guidance for States, Municipalities, and Air Pollution Control Agencies, and Section 7.4.3 of the Planning Grants Program Guidance for Federally Recognized Tribes, Tribal Consortia, and U.S. Territories provides more information on coordination and engagement.

*Q12: Can an applicant apply for an implementation project before a PCAP is complete?*

A12: As described in the project narrative requirements section of the NOFO (page 27), applicants for the CPRG implementation grants must include applicable PCAP reference(s) with their application including PCAP lead organization, PCAP title, PCAP website link, list of GHG reduction measures, and PCAP page numbers, which will not be available until the PCAP is complete.

*Q13: Will this grant require matching funds?*

A13: As explained in Section III.B of the NOFO (page 18), no cost sharing, matching funds or leveraged resources are required as a condition of eligibility under this competition.

*Q14: Will EPA offer additional rounds of funding, including for measures in the Comprehensive Climate Action Plans? Or is this the only opportunity for CPRG implementation grants?*

A14: EPA plans to award all available implementation grant funds (totaling \$4.6 billion through the two competitions that were announced on September 20, 2023) by the end of 2024. EPA anticipates awarding funds for the general competition in October 2024 and funds for the competition for Tribes and territories in December 2024. No additional rounds of CPRG implementation funding are anticipated at this time.

*Q15: What tools, resources, and technical assistance will EPA provide for applicants? Will EPA host webinars or trainings on the NOFOs?*

A15: Section IV of each NOFO provides important guidance on the information EPA would like to be provided in the grant application; and section V of each NOFO describes the evaluation criteria and scoring breakdown. EPA has provided example templates for the cover page and budget, and additional guidance in appendix E on calculation methodologies for the GHG reduction measures included in the application.

EPA has compiled publicly available tools and technical resources to assist eligible applicants with climate planning and made them available on EPA's [CPRG website](#). EPA's Office of Grants and

Debarment offers training and resources to assist applicants with preparing and submitting grant applications at: <https://www.epa.gov/grants/epa-grants-overview-applicants-and-recipients>.

EPA held informational webinars on the Tribes and territories competition on September 27 and October 5, 2023, and on the general competition on September 21 and October 3, 2023. Materials from these webinars are available [here](#). To stay informed about any additional webinars for implementation grant applicants, please visit the CPRG website for updates, and please sign up for the [CPRG Newsletter](#).

*Q16: How will EPA responses to questions be documented?*

A16: EPA will periodically update this Q&A document on the Tribes and territories competition, and a separate Q&A document for the general competition, with questions received through the [CPRG@epa.gov](mailto:CPRG@epa.gov) inbox and during the EPA informational webinars. Updated versions of each document will be posted publicly to the EPA CPRG website: <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>.

## **II. Eligible Applicants**

*Q1: Who is eligible to apply for an implementation grant under the Tribes and territories competition? If I didn't receive a planning grant, am I still eligible to apply? Do I have to develop my own PCAP to apply?*

A1: As explained in Section III.A (pages 16-18) of the Tribes and territories competition NOFO, entities eligible to apply for an implementation grant under this announcement are federally recognized Tribes, Tribal consortia, and territories. More specifically, Tribes, Tribal consortia, and territories that directly received a CPRG planning grant are eligible to apply for an implementation grant. In addition, Tribes, Tribal agencies, Tribal consortia, and territorial municipal agencies, departments, or other municipal government offices in Guam, American Samoa, Northern Mariana Islands, and U.S. Virgin Islands that did not directly receive a planning grant, but that seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP (submitted to EPA by April 1, 2024), are eligible to apply. An applicable PCAP is one that geographically covers the entity and contains GHG reduction measures that can be implemented by the entity. Please consult Table 2 of the NOFO for additional detail.

*Q2: What does it mean to be covered by a PCAP? Can I be covered by multiple PCAPs?*

A2: As explained in Section III.A of the NOFO, Tribes, Tribal agencies, Tribal consortia, and territorial municipalities that did not directly receive a planning grant but that seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP are eligible to apply. An applicable PCAP is one that geographically covers an entity and contains GHG reduction measures that can be implemented by the entity.

An entity may be covered by multiple PCAPs in some cases. For example, an applicable Tribal PCAP and an applicable state PCAP may each include measures that a particular Tribe could implement. The Tribe could reference measures from either or both PCAPs in its application.

*Q3: Are multiple agencies or offices within a Tribal or territorial government able to apply?*

A3: Yes, multiple agencies, departments, or other offices from a Tribe or territory are each eligible to apply. However, EPA recommends that such agencies coordinate with each other to avoid submitting



more than one application to implement the same GHG reduction measure in the same geographic location. See Table 2 (page 16-17) of the NOFO for more information.

*Q4: Are there any restrictions on the size and type of coalition I can organize for an implementation grant application?*

A4: As explained in Section III.A of the NOFO, a coalition consists of two or more eligible applicants applying to jointly implement one or more measures. A coalition may be comprised of any combination of eligible applicants, at the same or different levels of government. For example, a coalition could include two or more Tribes or Tribal consortia, multiple territorial municipalities, or a state and one or more tribes. In all cases, each coalition member must be an eligible applicant and be covered by a PCAP that contains the measure(s) for which the coalition seeks funding. For purposes of this program, a tribal consortium is an eligible applicant and as such may participate as a member and/or a lead applicant for a coalition.

As explained in section 1 of the workplan expectations (page 28 of the NOFO), a coalition application should briefly describe the role(s) and responsibilities of each coalition member in the project design and implementation. The application should also include an explanation of how each GHG reduction measure included in the application relates to a GHG reduction measure included in the relevant PCAP(s), why each measure was selected as a priority, and a description of how each measure will meet the goals of the CPRG program. To implement a measure as a coalition, each coalition member needs to have the same measure included in their respective PCAP.

One entity must be the lead applicant (see Section III.A) and responsible for managing any grant awarded under this program (see Section IV.C). Multiple eligible entities may apply as a coalition if the group shares a strong and substantial commitment to the proposed measures such that withdrawal by any single member from the coalition would fundamentally alter the design or expected outputs and outcomes of the proposed measures.

Not all partnerships are coalitions. For example, an individual applicant can apply for an implementation grant and have a partnership or collaboration with organizations that are not eligible to serve as the lead applicant (e.g., non-profit organizations or private sector companies). This type of arrangement would not be considered a coalition under CPRG.

Both an individual applicant, and the lead applicant of a coalition, may make subawards to partners (subrecipients) or use contractual arrangements to carry out a portion of the grant's activities in accordance with the guidelines for subawards and procurement activities described in Appendix A of the NOFO.

*Q5: Can I use a climate action plan that is not funded through a CPRG planning grant as the basis for my implementation grant application?*

A5: No. Applications for implementation grants must seek funding to implement measures that are included in a PCAP developed with funding from a CPRG planning grant (see Section I.B of the NOFO). Under the Tribes and territories competition, implementation grant applicants must seek to implement measures included in a PCAP submitted to EPA by April 1, 2024 (state and MSA PCAPs are due March 1, 2024).

*Q6: What entities are eligible to apply from Florida, Iowa, Kentucky, and South Dakota?*

A6: Tribes and Tribal consortia within the geographical boundaries of these states that received a planning grant or are otherwise covered by an MSA or Tribal PCAP are eligible to apply.

*Q7: Under a coalition, would coalition members be subgrantees of the coalition lead?*

A7: Yes, coalition members would be subgrantees of the lead applicant for a coalition. However, the lead applicant for a coalition must submit a Memorandum of Agreement (MOA) signed by all coalition members or other written instrument or documented arrangement as part of their application that clarifies the roles and responsibilities of all coalition members. All members of the coalition must be listed as subrecipients, except the eligible applicant that will be the recipient of the grant (the lead applicant). See Section III.A, Section IV.C, and Appendix E for more information on coalitions.

*Q8: Can I still apply for a planning grant to develop a PCAP?*

A8: The funding opportunity for the planning grants is closed. Eligible applicants that did not receive a planning grant may still apply for an implementation grant if they are covered by a PCAP as discussed in Section III.A of the Tribes and territories competition NOFO.

*Q9: Would EPA accept a less formal type of agreement for a coalition than a Memorandum of Agreement (MOA)? What if I am unable to get an MOA signed by all coalition members by the deadline for the application?*

A9: For the Tribes and territories competition, coalition members must demonstrate their commitment to the coalition and to fulfilling their role to ensure success of the proposed measures through a signed Memorandum of Agreement (MOA), or through another written instrument or documented arrangement. The MOA or other written instrument or documented arrangement should clarify the roles and responsibilities of all coalition members. The lead applicant for the coalition should submit the MOA or other written instrument or documented arrangement as an attachment as described in Section IV.B and Appendix E ("Guidelines for a Memorandum of Agreement for a Coalition"), as applicable. EPA does not have a specific format for the MOA or other written instrument or documented arrangement, but it should contain the elements provided in Appendix E of the NOFO.

*Q10: Does the MOA or other written instrument or documented arrangement need to be complete by the time I submit a Notice of Intent to Apply (NOI)?*

A10: No, the MOA or other written instrument or documented arrangement does not need to be completed before the submission of the NOI, but NOIs should list anticipated coalition members to the extent known. As the NOI is strongly recommended but optional, applicants will not be evaluated on the information included in the NOI.

*Q11: Can I add someone to the coalition after I apply?*

A11: EPA will not consider information submitted to EPA after the close of the NOFO, including additions of new members to a coalition. However, in the event that an applicant needs to make updates or changes to a submitted application *prior* to the application deadline, including adding coalition members and an updated MOA or other written instrument or documented arrangement, they may submit a revision to the application *as long as it is prior to the deadline*. Grants.gov provides [instructions](#) for applicants to make modifications to their application and resubmit their Grants.gov Workspace.

### **III. Eligible Measures**

*Q1: What types of projects are eligible for funding?*

A1: Applications must propose to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant and meet the threshold eligibility criteria in Section III.C. of the NOFO (page 18). Additionally, any application should be consistent with EPA's goals for implementation funding (see Section I.B of the NOFO, page 6). It is up to each applicant to make the case to EPA in their application how their proposed measure adheres to the workplan requirements in Section IV of the NOFO and meets to the evaluation criteria established in Section V of the NOFO. An illustrative list of potential GHG reduction measures can be found on pages 8-11 of the NOFO. However, this list is neither exhaustive nor definitive with respect to the measures that may be included in applications under this NOFO. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their applications.

EPA will not respond to individual questions about whether specific GHG reduction measures are eligible and how they might score in the general competition.

*Q2: Are carbon sink projects, or projects that enhance carbon removal, eligible?*

A2: An eligible GHG reduction measure under the CPRG implementation grants program may reduce GHG emissions or enhance carbon removal. Measures that enhance carbon removal are those that increase the removal of carbon dioxide from the atmosphere through, for example, the uptake of carbon and storage in soils, vegetation, and forests. Such measures may include actions related to management of lands in their current use, or as lands are converted to other uses (see Section I.B., page 7, of the Tribes and territories competition NOFO).

*Q3: Are climate adaptation or resilience measures eligible?*

A3: Eligible projects must meet the threshold eligibility criteria in Section III.C. of the NOFO (page 18), including reducing GHG emissions or enhancing carbon removal. Climate adaptation and resilience measures that do not result in a reduction in GHG emissions or enhance carbon removal are not eligible.

*Q4: Can an implementation grant application request funds to hire staff to implement GHG reduction measures included in the application?*

A4: In the budget detail for the application, costs for implementing GHG reduction measures may include staffing and contractual costs necessary to implement GHG measures, as well as training and staff capacity-building costs. See pages 35-39 of the NOFO for more information.

*Q5: Can an implementation grant application request funds for job training?*

A5: In order to be eligible, applications must be fully responsive to the NOFO and must be to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant. Applications may request funding to be used for high-quality workforce development activities that are tied to or facilitate implementation of a proposed GHG reduction measure (page 32 of the NOFO).

*Q6: How broadly or narrowly do GHG reduction measures need to be defined in the application?*

A6: Applicants should review the application expectations in Section IV and the evaluation criteria in Section V of the NOFO to determine what level of specificity of the GHG reduction measures to include

in the application. As explained in Section IV.B. of the NOFO, applications should provide details on each measure (page 27). Applicants should provide a detailed description of each of the proposed GHG reduction measures to be undertaken. These descriptions should include the major features, tasks, and milestones for each measure and explain how to ensure success of the measures. The application should also describe underlying assumptions and risks associated with those features, tasks, and milestones.

*Q7: Can I apply for funding to implement multiple GHG reduction measures in one application?*

A7: Yes, applications may include one or more proposed GHG reduction measures. Applications will be evaluated as a whole, and GHG reduction measures will not be scored individually (page 8 of NOFO). Therefore, applicants should include only those measures that are eligible and that meet the requirements described in this announcement. For applications that include multiple GHG reduction measures, applicants should provide assumptions, calculations, and documentation for each GHG reduction measure.

*Q8: Are implementation grants meant to implement a PCAP measure in its entirety, or can it focus on a subset of the components and actions in one measure?*

A8: An eligible applicant may apply to implement a portion of a measure included in a PCAP but should explain how the measure included in the application relates to a GHG reduction measure included in the relevant PCAP(s) (page 28 of the NOFO). Applications should only quantify emission reductions that will occur as a result of CPRG implementation grant funding. If CPRG funding represents a fraction of the total funding for a GHG measure, the total estimated GHG emission reductions should be scaled as explained on page 29 of the NOFO.

#### **IV. Contracts, Subawards, and Participant Support Costs**

*Q1: Can an applicant applying as an individual applicant make subawards to other eligible applicants, non-eligible entities, and contractors? If so, what requirements apply to subawards?*

A1: Yes, an individual applicant that is awarded an implementation grant may procure contractual support and/or issue subawards to subrecipients to carry out a portion of the grant project as described in Appendix A of the NOFO.

A contract (as described in 2 CFR § 200.331) is for the purpose of obtaining goods and services for the grant recipient's own use and creates a procurement relationship with the contractor. Grant recipients that enter into procurement contracts must comply with the applicable procurement provisions in 2 CFR § 200.317 through 200.327.

Grant recipients may make subawards to subrecipients to carry out a portion of the grant project; in such case, the grant recipient is also known as a "pass-through entity." Subawards establish a financial assistance relationship under which the subrecipient's employees and contractors implement programs and projects to accomplish the goals and objectives of the grant. It is important to bear in mind that subrecipients are subject to the same federal requirements as the pass-through entity. Under this competition, a non-federal entity is eligible to receive a subaward even if it is not eligible to receive a grant from EPA directly. If a recipient chooses to pass funds from its grant to other entities through subawards, the recipient must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA's General Term and Condition for Subawards](#).

*Q2: Could a non-profit group be paid with CPRG planning grant money to write an implementation grant for a Tribe, Tribal consortium, or territory?*

A2: Funds from the CPRG planning grants must go toward completing the required deliverables established in the Planning Grant Program Guidance. While grantees may sub-award planning grant funds to non-profits and may procure contractors to support the development of the CPRG planning grant deliverables, sub-awarding planning grants to a non-profit group to write an implementation grant application is not an eligible cost for the planning grants.

## V. Competition Structure

*Q1: What size grants can I apply for?*

A1: As explained in Section II.B (page 14) of the NOFO, applicants for the Tribes and territories competition can apply for grants ranging from \$1 million to \$25 million:

Tier	Grant Ranges	Funds Targeted for Each Tier	Anticipated Number of Grants to be Awarded
Tier A	\$15,000,000 – \$25,000,000	\$125 million	5-8
Tier B	\$5,000,000 – \$14,999,999	\$100 million	7-20
Tier C	\$1,000,000 – \$4,999,999	\$75 million	15-75

*Q2: How many applications can an eligible applicant submit? Is there an application limit per tier?*

A2: Each eligible applicant is limited to submitting two grant applications in total for this competition for Tribes and territories: one as an individual applicant, and one as the lead applicant for a coalition. Such applications may be in the same or in different tiers. Applicants may participate in more than one coalition but may only serve as lead applicant for one coalition (see Section III.A of the NOFO).

*Q3: Can two entities submit separate applications to fund the same measure?*

A3: As a threshold matter, EPA does not prohibit two eligible applicants from applying to fund the same measure under this NOFO. Furthermore, Tribes and territories may apply to implement the same measure in both the Tribes and territories competition and the general competition. However, EPA will not award multiple grants to implement the same measure in the same location (e.g., a territory and territorial municipality will not both receive a grant to implement a particular measure from the territory's PCAP in the municipality; either the territory or the municipality may receive the grant, but not both). Therefore, EPA strongly recommends that entities that may be considering applying for funding to implement similar measures communicate and coordinate prior to submitting applications.

EPA **does** prohibit a group of eligible applicants applying as a coalition from submitting multiple applications for the same set of GHG reduction measures using different lead applicants (page 19 of NOFO).

*Q4: The NOFO states that EPA will not award multiple grants to implement the same measure in the same location. Can you clarify what you mean by "same location"?*

A4: EPA will not fund duplicative work, i.e., multiple grants cannot fund the same measure being implemented in the same exact or overlapping geographic vicinity. For example, if a territorial agency applied to implement a measure across all jurisdictions in the territory and a municipality within that

same territory applied to implement the same measure within their municipality, EPA would not fund both applicants as there would be an overlapping geographic scope for the same measure. However, if two eligible entities (e.g., a tribe and a municipality) within the same state boundaries applied to implement the same measure only within their own respective boundaries and there was no overlap of geographic area, then both applications could receive funding (if both ranked highly enough to be recommended for funding).

## **VI. Evaluation and Awards**

*Q1: What are the differences between the Tribes and territories NOFO and the general competition NOFO? If Tribes and territories are considering whether to apply to both NOFOs, what do they need to know?*

A1: Tribes and territories may apply to both the general competition and the competition only for Tribes and territories. Note that to participate in the general competition, Tribes and territories will have to meet the requirements of the general competition. Importantly, to compete in the general competition, the PCAP on which any Tribal or territorial implementation grant application is based must be submitted to EPA by March 1, whereas to compete in the Tribes and territories competition, the PCAP on which their implementation grant application is based must be submitted to EPA by April 1.

In addition, the evaluation criteria for the two competitions are different and the workplan can be up to 25 pages for the general competition, whereas the workplan is limited to 15 pages for the Tribes and territories competition application. The general competition has five funding tiers with grant awards ranging from \$2 million to \$500 million, whereas the tribal competition has three funding tiers with grant awards ranging from \$1 million to \$25 million. These are some of the major differences between the two competitions.

*Q2: What is EPA's process for scoring the applications and awarding the grants?*

A: The evaluation criteria and selection process are explained in Section V of the NOFO. Applications will first be evaluated against the threshold factors listed in Section III.C. of the NOFO. Only those applications that meet all of the threshold factors will be evaluated by a review panel using the evaluation criteria in the NOFO. Each eligible application will be given a numerical score and will be rank ordered by the review panel against other applications in the same funding tier. For this Tribes and territories competition, EPA will have three funding tiers as described in Section II.B. EPA intends to make awards to top ranked applications in each tier. Preliminary funding recommendations will be provided to the EPA selection official based on the panel reviews and rankings. Final funding decisions will be made by the EPA selection official based on the rankings and preliminary recommendations of the EPA evaluation team and the other factors listed in Section V.C.

*Q3: Will Tribes need to discuss and calculate benefits to low-income and disadvantaged communities if applying under the Tribes and territories competition?*

A3: As described on page 32 of the Tribes and territories competition NOFO (regarding section 4 of the work plan on benefits and community engagement), applications should discuss benefits and potential disbenefits to communities, particularly those that are disadvantaged or overburdened by pollution, from their proposed GHG reduction measures.

Federally recognized Tribes meet the definition of disadvantaged communities for the purposes of the CPRG grant program (page 11 of the NOFO). A Tribal application to the Tribes and territories

competition should include Tribal community benefits that would result from implementation of the measures.

*Q4: If we do not have a history of managing EPA grants, will that negatively affect the points we get for criteria 5.a (past performance) and 5.b (reporting requirements)? Will this effectively disqualify our application or limit our chances to secure CPRG grant funding?*

A4: If your organization does not have a history of managing EPA grants, it will not disqualify your application. Page 47 of the Tribes and territories NOFO, under section 5, "Programmatic Capability and Past Performance," states: "Note: In evaluating applicants under the past performance criteria in 5.a and 5.b, EPA will consider the information provided by the applicant and may also consider relevant information from other sources, including information from EPA files and from current/prior grantors (e.g., to verify and/or supplement the information provided by the applicant). If the applicant does not have any relevant or available past performance or reporting information, please indicate this in the application. The application will receive a neutral score for criteria 5.a and 5.b. A neutral score is 2.5 points of 5 possible points for each criterion. If the applicant does not provide any response for these items, they may receive a score of 0 for these criteria."

Applicants may also include information describing their programmatic capability and past performance in managing assistance agreements funded by other federal or non-federal entities.

*Q5: EPA provides templates for several of the required deliverables (e.g., Cover Page, Budget Table, etc.). Am I required to use these resources in my application?*

A5: No, you are not required to use these templates for your application. Use of these example templates is optional. However, we do encourage the use of these example templates to help expedite EPA's application review process.

*Q6: Where should I send a question about the Evaluation Criteria or other application requirements?*

A6: Questions regarding all aspects of the CPRG implementation grants NOFOs (including evaluation criteria and required application requirements) should be directed to the EPA email address: [CPRG@epa.gov](mailto:CPRG@epa.gov). EPA will update this Q&A document on a regular basis with the responses to incoming questions. EPA does not intend to respond to each email individually.

*Q7: EPA provides a list of GHG reduction measures in the Tribes and territories competition NOFO. Are these the only measures that EPA will fund under this program?*

A7: On pages 8-11 of the NOFO, EPA provided a list of *example* GHG reduction measures in six key sectors. This list is neither exhaustive nor definitive with respect to the measures that may be included in competitive applications under the Tribes and territories competition. These are not the only measures that EPA will consider eligible for funding under CPRG implementation grants. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their applications.

*Q8: What types of applicant diversity will be considered in the selection process?*

A8: EPA anticipates awarding no more than two grants to applicants at the same level of government within a single jurisdiction (e.g., a single tribal area or territory). In addition, EPA will make selections to ensure diverse geographic coverage of CPRG implementation funding across the different funding tiers.

However, EPA reserves the right to exceed these targets in the event that there is an inadequate number of meritorious applications from entities in other areas.

In making the final funding decisions, the EPA selection official may also consider certain programmatic priorities and the geographic diversity of awardees. Additional consideration may be given to making awards that advance the Justice40 Initiative, provide GHG reduction measures in key sectors, and/or provide greater diversity in the types of entities receiving CPRG implementation funds. (e.g., Tribal and territorial agencies and departments). Once final decisions have been made, a funding recommendation will be developed and forwarded to the EPA award official (Section V.B and C of the NOFO).

Q9: Do I need to quantify criteria air pollutant (CAP) and hazardous air pollutant (HAP) emissions impacts in the application?

A9: While quantified CAP and HAP emissions estimates are not required for the application, applicants should **list** CAP and HAP emissions reductions as expected outcomes in section 3 of the workplan if they are expected from the proposed measures in the application. Such applications should qualitatively list CAP or HAP reductions or, where possible, quantify CAP and HAP emissions reductions in section 4 of the workplan.

*Q10: Do I need to quantify GHG emissions impacts in the application?*

A10: Yes, EPA will assess applications on the magnitude of GHG emission reductions estimated for the proposed measures.

*Q11: How will EPA evaluate the magnitude of GHG emission reductions? Will it consider the relative reductions achieved for the entities?*

A11: Under evaluation criteria 2.a and 2.b, EPA will evaluate applications on the magnitude of GHG reductions achieved, regardless of the type of applicant (Tribe, Tribal consortium, coalition, etc.). This is in keeping with the programmatic priorities to reduce near-term GHG emissions contributing to climate change.

As explained in Section II.B of the NOFO, EPA has established tiers to reflect differences in scope, scale, and cost of GHG reduction measures. Applications will be evaluated against other applications in the same tier. As explained in Section V.C, in making the final funding decisions, the EPA selection official may also consider certain programmatic priorities and the geographic diversity of awardees. Additional consideration may be given to making awards that advance the Justice40 Initiative, provide GHG reduction measures in key sectors, and/or provide greater diversity in the types of entities receiving CPRG implementation funds.